Exhibit 1



TECHNICAL REPORT

INDIAN CREEK WATERSHED PERIPHYTON DENSITY AND PHOSPHORUS CONCENTRATION SURVEY



TELFORD BOROUGH AUTHORITY
BUCKS AND MONTGOMERY COUNTIES, PA
NPDES No. PA0036978

DECEMBER 2014



Table of Contents

		PAGE
I.	Project Description	1
II.	Professional Qualifications	5
III.	Quality Assurance Procedures	7
IV.	Results	10
V.	Conclusions	13
	List of Tables	
	1: GPS Locations	
Table 2	2: Benthic Periphyton Measurements	10
Table 3	3: Periphyton and Phosphorus Results	11
	List of Figures	
Figure	e 1: Sampling Map	2
Figure	2: Periphyton Density versus Phosphorus Concentration	11
Figure	e 3: Periphyton Density versus Percent Unshaded	12
	List of Appendices	
Appen	ndix A Sampling Site Photos	
Appen	ndix B Laboratory Results	
Appen	ndix C Periphyton Substrate Photo-Documentation	

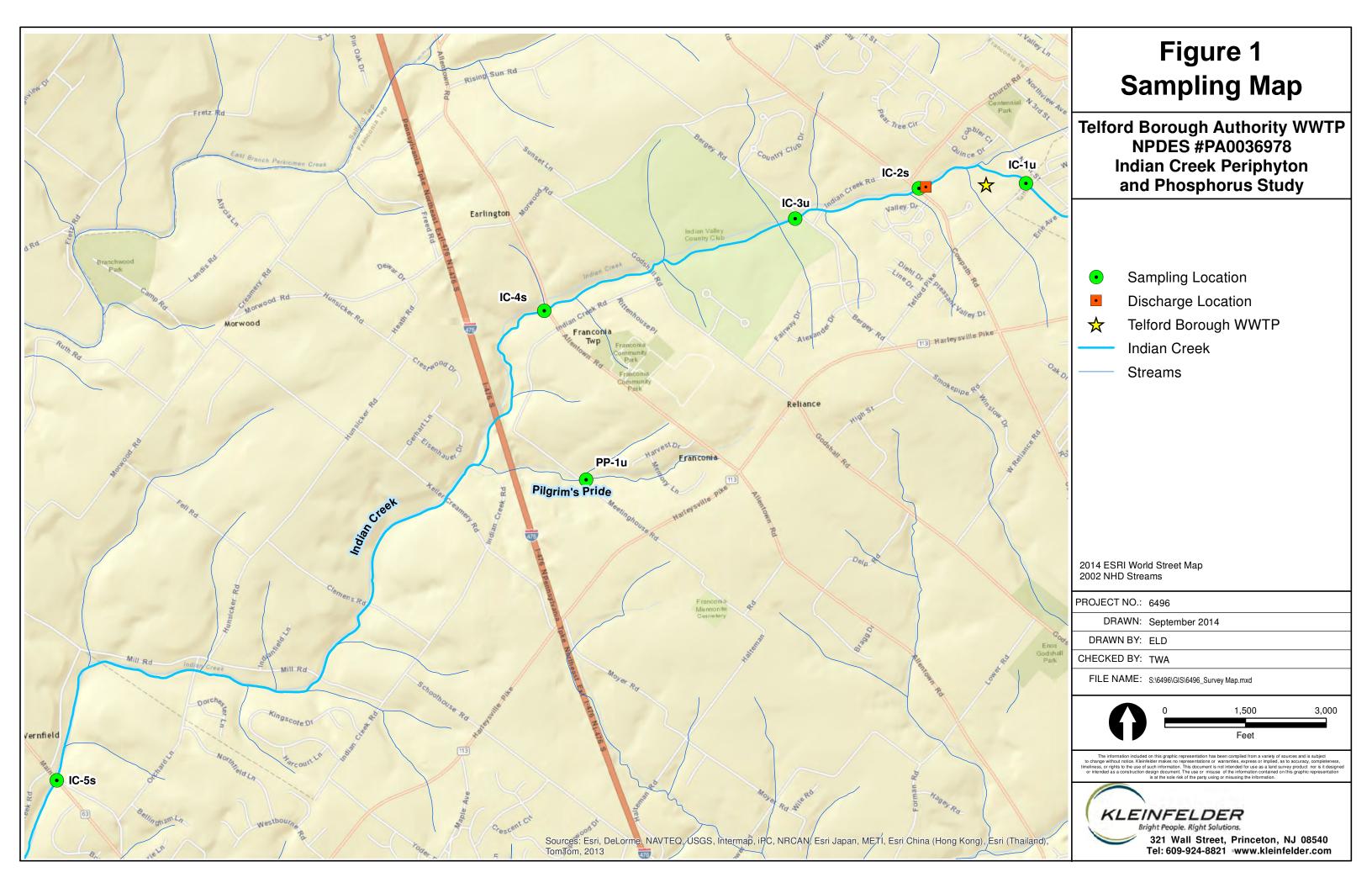


I. PROJECT DESCRIPTION

The Telford Borough Authority (TBA) wastewater treatment plant (WWTP), located at 109 Telford Pike in Telford, Pennsylvania, is currently authorized to discharge 1.1 million gallons per day (MGD) of treated sanitary wastewater to Indian Creek, in accordance with the requirements of its National Pollutant Discharge Elimination System (NPDES) permit (#PA0036978). A periphyton density and phosphorus concentration survey was performed at multiple locations in the Indian Creek watershed in order to characterize the influence of phosphorus and canopy cover on periphyton density.

An initial visit to each sampling location was performed on September 11, 2014 to confirm access, identify the exact location using a global position system (GPS), and establish any necessary safety protocols. Actual sampling was performed by two Kleinfelder sampling engineers on September 24, 2014. The survey was performed during a single sampling event during conditions that were optimal for assessing nutrient impacts. Specifically, surface flows at the nearest relevant continuous stream flow gage (USGS 01472810 East Branch Perkiomen Creek near Schwenksville, PA) did not show any runoff flows during the 18 days prior to the sampling event. Furthermore, the nearby precipitation gage at the airport in Quakertown, PA (KUKT) did not record a single rain event greater than one-half inch in the 59 days prior to the sampling event.

Sampling was performed at six (6) sampling locations within the Indian Creek watershed, as described below and shown in Figure 1. Locations were selected to represent a variety of phosphorus and shade conditions (see site location photos in Appendix A). Locations were intentionally selected such that conditions were either 100% shaded or 100% unshaded, when such conditions existed within the desired stream segment. The degree of shade was measured in the field as "Percent Unshaded" by facing south and approximating the percentage of view to sky (to the nearest 10%) along a sunrise-sunset parabola.





Sampling Locations

IC-1u: Indian Creek approximately 75 feet downstream of West Broad Street in Telford. This location is approximately 2,000 feet upstream of the TBA WWTP outfall, and mostly unshaded at the point where sampling was performed.

IC-2s: Indian Creek immediately upstream of Cowpath Road in Franconia. This location is 140 feet downstream of the TBA WWTP outfall, and shaded at the point where sampling was performed.

IC-3u: Indian Creek immediately downstream of Bergey Road in Franconia.

This location is approximately 0.5 miles downstream of the TBA WWTP outfall, and unshaded at the point where sampling was performed.

IC-4s: Indian Creek immediately downstream of Allentown Road in Franconia.

This location is approximately 1.5 miles downstream of the TBA WWTP outfall, and shaded at the point where sampling was performed.

IC-5s: Indian Creek immediately upstream of Route 63 (Main Street) in Upper Salford. This location is approximately 4.5 miles downstream of the TBA WWTP outfall, and shaded at the point where sampling was performed.

PP-1u: Pilgrims Pride tributary immediately downstream of Meetinghouse Road in Franconia. This location is upstream of any point source influence, and unshaded at the point where sampling was performed.



The GPS latitudes and longitudes for each sampling location, as well as the TBA WWTP outfall are provided in Table 1 below.

Table 1: GPS Locations

Site	Latitude	Longitude
IC-1u	40.32205065052	-75.33801541442
IC-2s	40.32208450619	-75.34517408883
IC-3u	40.32062650000	-75.35352710000
IC-4s	40.31634510000	-75.37046690000
IC-5s	40.29299762841	-75.40395131075
Outfall	40.32201460000	-75.34468710000
PP-1U	40.30765140000	-75.36798970000

Benthic periphyton density and instream phosphorus concentration were measured at each sampling location, in accordance with the quality assurance procedures described in Section III.

- Kleinfelder field staff collected substrate (rock) samples at each location.
 Periphyton material was scraped by Kleinfelder staff in the field, and the algal slurries were delivered to QC Laboratories for chl-a analyses.
- Kleinfelder field staff collected a single water quality sample at each location and transported the samples to QC Laboratories for total phosphorus analyses.



II. PROFESSIONAL QUALIFICATIONS

Kleinfelder is an employee-owned engineering, architecture, and science consulting firm providing solutions to meet our world's complex infrastructure and natural resource Kleinfelder's Princeton Office specializes in helping clients overcome challenges. technical and regulatory challenges relating to water resources. engineering professionals at this office have been performing nutrient impact studies, including chemical and biological assessments, for more than 25 years. Kleinfelder served as the prime contractor for the Rutgers University New Jersey EcoComplex in developing diagnostic modeling and assessment tools to address nutrient impairments throughout the entire non-tidal Passaic River and Raritan River Basins, as well as nutrient impact characterization studies of the Rancocas Creek and Pennsauken Creek watersheds. Kleinfelder is well known for the depth of experience it brings to watershed characterization and assessment studies involving nutrients. Additional information capabilities of regarding the the firm can be found here: http://www.kleinfelder.com/index.cfm/services/water-science-engineering/surface-waterplanning-analysis/. Three key staff were involved in this sampling project:

- James F. Cosgrove, Jr., P.E. Vice President / Principal. Jim Cosgrove has more than 25 years of private consulting experience, and is a recognized expert in the fields of water quality monitoring and modeling, watershed management, and litigation support. Mr. Cosgrove is a Professional Engineer; he earned his B.S. in Civil Engineering from Lafayette College and his M.E. in Environmental and Water Resource Systems Engineering from Cornell University. Mr. Cosgrove provided overall quality and project management.
- Thomas Amidon, CLP Principal Water Resources Scientist. Tom Amidon has over twenty years of experience, including ten years as a research scientist in the New Jersey Department of Environmental Protection, and ten years of private consulting. His areas of expertise include surface water quality studies, watershed management, and environmental impact assessment. Mr. Amidon is a nationally Certified Lake Professional, and was appointed by the Commissioner to the New Jersey DEP Science Advisory Board's Water Quality/Quantity Committee and Nutrient Work Group. He earned his B.S. in Biology from the



Pennsylvania State University and his M.S. in Engineering Science from the State University of New York at Buffalo. Mr. Amidon developed a periphyton density and phosphorus concentration survey that addresses the technical and regulatory challenges associated with the project.

Joseph (JJ) Schwarz – Senior Staff Engineer. Mr. Schwarz has a broad background in environmental engineering, with extensive experience in field sampling and nutrient impairment studies. He manages Kleinfelder's laboratory and acts as our Quality Assurance Officer. Mr. Schwarz graduated from the University of Notre Dame with a B.S. in Engineering and Environmental Sciences and later received a Master of Engineering degree from Cornell University in Systems Engineering. Mr Schwarz performed the field sampling relating to this project.



III. QUALITY ASSURANCE PROCEDURES

The following quality assurance procedures and methodology were applied to the sample collection and analyses conducted for this study.

Temporal Aspects

Samples were collected at each location during a single sampling event. Sampling was targeted between May and October during dry weather, low-flow conditions, and at a minimum of fourteen days after a rain event of at least 0.5 inches of precipitation. Sampling was performed on September 24, 2014, 18 days after stream flows were impacted by any runoff, and 59 days after a rain event greater than 0.5 inches.

Sampling Procedures

Kleinfelder field staff collected periphyton samples at each location in accordance with Pennsylvania DEP Field Protocol: Periphyton Standing Crop and Species Assemblages (December 2013). One to three substrate (rock) samples were collected at random locations along three transects at each location (a total of three to nine rocks at each

location). Periphyton material was scraped by Kleinfelder staff in the field; all algal material was removed from a fixed area of each rock using a Pennsylvania Epilithic Periphyton (PEP) Sampler with brush-tipped Dremel tool (see photo on right). Algal slurries were stored in 1-liter amber glass containers with ice in a cooler and transported to QC Laboratories (PA 09-00131) on the same day.



Kleinfelder field staff also collected a single water quality sample at each location such that it was representative of the stream cross section. At least three subsurface grab samples were collected across the stream in order to obtain a representative sample. These grab samples were then composited in a larger volume container, from which the



desired volume was transferred to a sample bottle. A dedicated large volume container was assigned to each sample location. Prior to each sampling event, the large volume containers were decontaminated according to the following procedure: (1) distilled/deionized water rinse; (2) non-phosphate detergent wash; (3) distilled/deionized water rinse; (4) air dry; and (5) distilled/deionized water rinse. Samples were preserved with sulfuric acid and stored in 500-ml plastic containers with ice in a cooler and transported to QC Laboratories (PA 09-00131) on the same day.

Sample Analyses

QC Laboratories (PA 09-00131), a PA-certified laboratory, provided new sample containers and performed all sample analyses. The total volume of algal slurry was measured in the laboratory, and a slurry subsample was analyzed for chlorophyll-a using EPA Method 446. Chlorophyll-a density was calculated based on the area scraped and the volume of algal slurry produced. The stream sample was analyzed for total phosphorus using Standard Method 4500P.

Quality Assurance and Quality Control

Chain of custody procedures were followed for all samples collected for this study. A sample is in someone's "custody" if:

- It is in one's actual physical possession;
- It is in one's view, after being in one's physical possession;
- It is in one's physical possession and then locked up so that no one can tamper with it; and
- It is kept in a secured area, restricted to authorized personnel only.

Calibration and preventive maintenance of laboratory equipment were in accordance with 40 CFR Part 136.

Preservation techniques, holding times, and measurements of the sampled parameters were performed in accordance with 40 CFR Part 136. A temperature blank was used to verify preservation requirements. No deviations from the test procedures and/or preservation methods and holding times occurred.



40 CFR Part 136 was followed for all quality assurance and quality control (QA/QC) practices, including detection limits, quantitation limits, precision, and accuracy.

Project Organization and Responsibility

Overall Project Coordination Officer: James F. Cosgrove, Jr., P.E.					
Overall QA Officer: Joseph Schwarz					
Performance/Systems Auditing: Thomas Amidon					
Data Processing/Data Quality Review Officer: Thomas Amidon					
Sampling Operations Field Supervisor: Joseph Schwarz					
Laboratory QA Officer: Robert Martino, QCL					
Laboratory Director: Ommen V. Kappil, QCL					



IV. RESULTS

The laboratory data report is provided in Appendix B. Benthic periphyton density at each location was calculated based on the measurements in Table 2 below. The PEP sampler was used to scrape a circle with an area of 20.3 cm² from each rock. Slurry volume and Chlorophyll-a concentration were measured in the laboratory. Photo-Documentation of individual periphyton substrate samples is provided in Appendix C.

Table 2: Benthic Periphyton Measurements

Site ID	# Rocks	Area Scraped (cm²)	Total Slurry Volume (mL)	Chlorophyll-a (mg/L)	
IC-1U	8 162.4 497		10.9		
IC-2S	9	182.7	505	11.1	
IC-3U	3	60.9	233	21.6	
PP-IU	3	60.9	280	15.0	
IC-4S	9	182.7	641	8.9	
IC-5S	9	182.7	530	17.1	

Benthic periphyton density was calculated based on the slurry volume and concentration, as well as the area of substrate scraped:

$$PeriphytonDensity (mg/m^2) = \frac{SlurryVolume (ml) * SlurryConcentration \left(\frac{mg}{L}\right)}{AreaScraped (cm^2)} * 10$$

Periphyton density and total phosphorus concentration at each location are provided in Table 3 below, along with the estimated degree of shade at each site. Periphyton densities were significant at all locations, reflecting the optimal conditions during which sampling occurred.

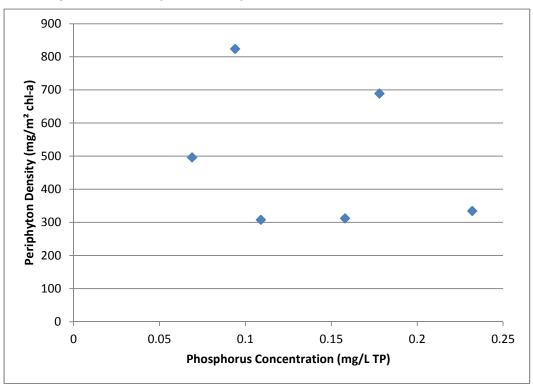


Table 3: Periphyton and Phosphorus Results

Site ID	Periphyton Chlorophyll-a (mg/m²)	Total Phosphorus (mg/L)	Percent Unshaded
IC-1U	335	0.232	70%
IC-2S	308	0.109	0%
IC-3U	824	0.094	100%
PP-IU	689	0.178	100%
IC-4S	312	0.158	0%
IC-5S	496	0.069	0%

As shown in Figure 2, periphyton density in the Indian Creek watershed was not at all correlated with phosphorus concentration.

Figure 2: Periphyton Density versus Phosphorus Concentration





As shown in Figure 3, periphyton density was somewhat related to the degree of shading, which explained about half of the variance in periphyton density among the sites. However, even at completely shaded locations (i.e., 0% Unshaded), periphyton densities ranged from 300 to 500 mg/m² chlorophyll-a.

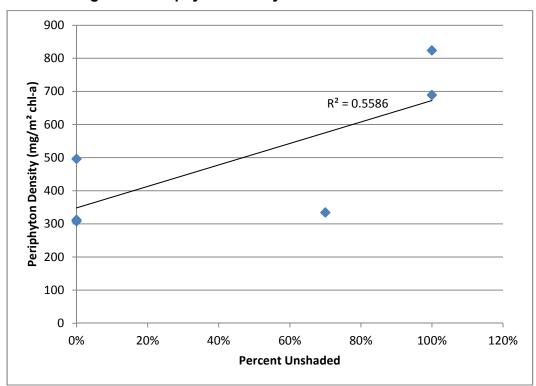


Figure 3: Periphyton Density versus Percent Unshaded



V. CONCLUSIONS

On behalf of the Telford Borough Authority and at the direction of its Attorney, John C. Hall, Kleinfelder performed a periphyton density and phosphorus concentration survey at six locations throughout the Indian Creek watershed. The survey was conducted in accordance with relevant PADEP protocols and a professional standard of care; laboratory analyses were conducted by a PADEP-certified laboratory. The survey was performed on a single day (September 24, 2014) when conditions were appropriate for assessing nutrient impacts. No relationship between phosphorus concentration and periphyton density was detected in the Indian Creek watershed. It does appear that the degree of shading accounts for at least some of the differences in periphyton density that were detected among the locations in the Indian Creek watershed. Results can be relied upon for environmental and regulatory assessment purposes.



APPENDIX A
Sampling Site Photos



IC-1u



IC-2s









IC-4s





IC-5s



PP-1u





APPENDIX B
Laboratory Results



Analytical Report

Serialized: 11/03/2014 09:32am QC21

JOSEPH SCHWARZ KLEINFELDER EAST, INC. RESEARCH PARK 321 WALL STREET PRINCETON,NJ 08540 Regarding:

KLEINFELDER EAST, INC. RESEARCH PARK 321 WALL STREET PRINCETON, NJ 08540

PROJECT ID:

C00224

LABORATORY REPORT NUMBER:

L5257442

PO NUMBER:

6496

REVISED REPORT NOTIFICATION

The Chlorophyll A results were revised.



Opponent V. Kappil, QA Director

QCL Accreditations: Southampton Div: EPA ID PA00018; NELAP ID's: PA 09-00131, NJ PA166, NY 11223
State ID's: CT PH-0768, DE PA-018, MD 206, SC 89021001; FDA Reg. # : 2515238
Delaware Division: State ID's: DE 00011, MD 138
Vineland Division: State ID: NJ 06005; Reading Div: State ID: PA 06-03543
Wind Gap Division: State ID's: PA 48-01334, NJ PA001
E. Rutherford Division: State ID: NJ 02015

Analytical Report

KLEINFELDER EAST, INC. C00224

P.O. No: 6496 Inv. No: 1652286 PI PWSID:

JOSEPH SCHWARZ KLEINFELDER EAST, INC. RESEARCH PARK 321 WALL STREET PRINCETON, NJ 08540

PIN: 56623

Regarding: JOSEPH SCHWARZ KLEINFELDER EAST, INC. RESEARCH PARK 321 WALL STREET PRINCETON, NJ 08540

SAMPLE SUMMARY

Lab ID	Collected	Received	Matrix	Client ID
•				
L5257442-1	09/24/14 09:30	09/26/14 10:04	WASTEWATER	INDIAN POINT, IC-1U
L5257442-2	09/24/14 10:40	09/26/14 10:04	WASTEWATER	IC-2S
L5257442-3	09/24/14 11:30	09/26/14 10:04	WASTEWATER	IC-3U
L5257442-4	09/24/14 13:45	09/26/14 10:04	WASTEWATER	PP-IU
L5257442-5	09/24/14 13:00	09/26/14 10:04	WASTEWATER	IC-4S
L5257442-6	09/24/14 14:15	09/26/14 10:04	WASTEWATER	IC-5S

This report is a revision of report number 4171286 Serial Number: 4171326

Page 2 of 11

Analytical Report

Sample Description:

INDIAN POINT, IC-1U

Sample Number: Matrix:

Received Temp:

L5257442-1 WASTEWATER

2.3 C

Samp. Date/Time/Temp:

Sampled by: Iced (Y/N):

09/24/14 09:30am NA C

Customer

GENERAL CHEMISTRY

Analytical Method: Dilution:

SM 4500P B.5 E

Run Date: 10/02/14 09:40AM

Workgroup: File ID:

100214TP1

3 mg/l Analyst: NM

Basis:

p_tot_1003_0808.csv

Instrument: Genysis 20

MDL*

RL

Parameter

Phosphorus, total as P

CAS N/A

CAS

N/A

Result 0.232

0.0210

0.0300

AQUATIC TOXICOLOGY DIVISION

Analytical Method: Dilution:

EPA 446.0

QC Laboratories does not hold NELAC certification for chlorophyll A.

Analyst: MV

Run Date: 09/30/14 10:40AM

Workgroup: File ID: Basis:

Units:

PIN: 56623

Units:

Instrument:

Result 334.58

MDL* 0.1000 RL

Parameter Chlorophyll a

Sample Comments:

The Chloropyll A results are in mg/m2.

*=This limit was used in the evaluation of the final result.

Matrix:

Received Temp:

Analytical Report

Sample Description: IC-2S Sample Number:

L5257442-2 WASTEWATER

2.3 C

Samp. Date/Time/Temp: Sampled by:

09/24/14 10:40am NA C

Customer

Iced (Y/N):

GENERAL CHEMISTRY

Analytical Method: SM 4500P B.5 E

Parameter

Dilution: Units:

Run Date: 10/02/14 09:40AM

Analyst: Instrument: Genysis 20 Workgroup: File ID:

100214TP1 p_tot_1003_0808.csv

mg/l

CAS N/A

Result 0.109

MDL* 0.0210

RL 0.0300

AQUATIC TOXICOLOGY DIVISION

Phosphorus, total as P

Analytical Method: Dilution:

Units:

PIN: 56623

EPA 446.0

Run Date: 09/30/14 10:40AM

Analyst: Instrument: Workgroup: File ID: Basis:

Basis:

Parameter Chlorophyll a CAS N/A

Result 308.097 MDL* 0.1000 RL

Sample Comments:

QC Laboratories does not hold NELAC certification for chlorophyll A.

The Chloropyll A results are in mg/m2.

*=This limit was used in the evaluation of the final result.

This report is a revision of report number 4171286 Serial Number: 4171326

Page 4 of 11

Analytical Report

Sample Description:

IC-3U

Sample Number: Received Temp:

L5257442-3 WASTEWATER Samp. Date/Time/Temp:

09/24/14 11:30am NA C

Matrix:

2.3 C

Sampled by: Iced (Y/N):

Customer

GENERAL CHEMISTRY

Analytical Method:

SM 4500P B.5 E

Run Date: 10/02/14 09:40AM

Workgroup: File ID:

100214TP1

Dilution: Units:

mg/l

Analyst: Instrument: Genysis 20

Basis:

p_tot_1003_0808.csv

Parameter Phosphorus, total as P

CAS N/A

Result 0.0940

MDL* 0.0210

RL 0.0300

AQUATIC TOXICOLOGY DIVISION

Analytical Method: Dilution:

Units:

PIN: 56623

EPA 446.0

Analyst: Instrument:

Run Date: 09/30/14 10:40AM

Workgroup: File ID: Basis:

Parameter Chlorophyll a CAS N/A

Result 824.276 MDL* 0.1000 RL

Sample Comments:

QC Laboratories does not hold NELAC certification for chlorophyll A.

The Chloropyll A results are in mg/m2.

*=This limit was used in the evaluation of the final result.

Analytical Report

Sample Description: PP-IU Sample Number: L5257442-4

Matrix: Received Temp:

WASTEWATER 2.3 C

Samp. Date/Time/Temp: Sampled by:

Iced (Y/N):

09/24/14 01:45pm NA C

Customer

GENERAL CHEMISTRY

Analytical Method: SM 4500P B.5 E

Dilution: Units:

mg/l

Run Date: 10/02/14 09:40AM

Analyst: Instrument: Genysis 20 Workgroup: File ID: Basis:

100214TP1

p_tot_1003_0808.csv

Parameter Phosphorus, total as P

CAS N/A

Result 0.178

MDL* 0.0210

RL 0.0300

AQUATIC TOXICOLOGY DIVISION

Analytical Method: Dilution:

Units:

PIN: 56623

EPA 446.0

Run Date: 09/30/14 10:40AM Analyst:

Instrument:

Workgroup: File ID: Basis:

Parameter Chlorophyll a CAS N/A

Result 689.45

MDL* 0.1000 RL

Sample Comments:

QC Laboratories does not hold NELAC certification for chlorophyll A.

The Chloropyll A results are in mg/m2.

*=This limit was used in the evaluation of the final result.

Analytical Report

Sample Description: IC-4S

Sample Number: L5257442-5

Matrix: Received Temp: WASTEWATER 2.3 C

Samp. Date/Time/Temp:

09/24/14 01:00pm NA C

Sampled by:

Iced (Y/N):

Customer

GENERAL CHEMISTRY

Analytical Method: SM 4500P B.5 E

Dilution: Units:

mg/l

Run Date: 10/02/14 09:40AM

Analyst: Instrument: Genysis 20 Workgroup: File ID: Basis:

100214TP1

p_tot_1003_0808.csv

Parameter

CAS N/A

Result 0.158

MDL* 0.0210

RL 0.0300

AQUATIC TOXICOLOGY DIVISION

Phosphorus, total as P

Analytical Method: Dilution:

Units:

PIN: 56623

EPA 446.0

Run Date: 09/30/14 10:40AM

Analyst: Instrument: Workgroup: File ID: Basis:

Parameter Chlorophyll a CAS N/A

Result 312.293 MDL* 0.1000 RL

Sample Comments:

QC Laboratories does not hold NELAC certification for chlorophyll A.

The Chloropyll A results are in mg/m2.

*=This limit was used in the evaluation of the final result.

Matrix:

Received Temp:

Analytical Report

Sample Description: IC-5S Sample Number:

L5257442-6 WASTEWATER

Samp. Date/Time/Temp: Sampled by: 2.3 C

09/24/14 02:15pm NA C

Customer

Iced (Y/N):

GENERAL CHEMISTRY

Analytical Method: SM 4500P B.5 E

Phosphorus, total as P

Parameter

Dilution: Units: mg/l

Run Date: 10/02/14 09:40AM

CAS

N/A

Analyst: Instrument: Genysis 20 Workgroup: File ID:

100214TP1

p_tot_1003_0808.csv

0.0690

Basis: Result

MDL* 0.0210

RL 0.0300

AQUATIC TOXICOLOGY DIVISION

Analytical Method: Dilution:

Units:

PIN: 56623

EPA 446.0

Run Date: 09/30/14 10:40AM

Analyst: Instrument: Workgroup: File ID:

Basis:

Parameter Chlorophyll a CAS N/A

Result 496.268 MDL* 0.1000 RL

Sample Comments:

QC Laboratories does not hold NELAC certification for chlorophyll A.

The Chloropyll A results are in mg/m2.



^{*=}This limit was used in the evaluation of the final result.

DEFINITIONS

The following terms or abbreviations are used in this report:

MPN Most probable number PL Customer-specific limit

CFU Colony forming unit DF Dilution Factor (For Microbiology, DF = volume of sample tested)

Positive QUAL Qualifier

NEG Negative NTU Nephelometric turbidity units

PRES Presumptive RL Laboratory reporting limit or Limit of Quantitation (LOQ)
MF Membrane Filtration MCL EPA recommended "Maximum Contaminant Level"

TNTC Too numerous to count MDL Method Detection Limit

ND The analyte was not detected at a concentration above the RL / MDL.

J Estimated value > MDL but < RL. Applies to organics and general chemistry results (see below for metals)

Q Indicates this analyte did not meet quality control requirements.

DRY Indicates the result was calculated and reported on a dry weight basis.

TIC Tentatively Identified Compounds (Library Search Compounds); concentrations are estimated values only.

ppm (mg/l) Parts per million: equivalent to 1 milligram per kilogram (mg/Kg) for solids or one milligram per liter (mg/L) for aqueous

samples.

POS

ppb (ug/L) Parts per billion: equivalent to 1 microgram per kilogram (ug/Kg) for solids or one microgram per liter (ug/L) for aqueous

samples.

Less than: In conjunction with a numerical value, indicates a concentration less than RL / MDL.

> Greater than: In conjunction with a numerical value, indicates a concentration greater than RL / MDL.

Data Qualifiers (EPA CLP Convention)

Organics		Metals	
В	Analyte was detected in the method blank	В	Value is \geq MDL and $<$ RL
Е	Concentration exceeds calibration range	Е	Estimated value due to presence of interference
U	Compound not detected above MDL/RL	M	Duplicate precision for an element outside control limit
N	Presumptive evidence of compound in library search	N	Spike recovery for an element outside control limits
P1	Column precision criteria not met, report lower value	U	Element not detected above MDL/RL
P2	Column precision criteria not met, report higher value	Other	Defined in case narrative or data package
Other	Defined in case narrative or data package		

Warranties, Terms, and Conditions

- Unless otherwise specified in the Parameter field, analyses (excluding "Field Parameters") were performed at the QCL Southampton Division (1205 Industrial Boulevard, Southampton, PA 18966). Food, pharmaceutical, and dairy testing were performed the QCL facility in Horsham (702 Electronic Drive, Horsham, PA 19044).
- The test results meet all TNI or other applicable regulatory agency requirements, including holding times and preservation, unless otherwise
 indicated.
- The report shall not be reproduced, except in full, without the written consent of the laboratory.
- All samples are collected as "grab" samples unless otherwise identified.
- The reported results relate only to the sample as tested. QCL is not responsible for sample integrity unless sampling has been performed by a member of our staff.
- QCL is not responsible for sampling and/or testing omissions. Note that regulatory authorities may assess substantial fines for testing omissions. Please track your sample collection schedules and results on a regular basis (e.g. weekly, monthly, or quarterly) to ensure compliance. QCL's internet program "LIVE ACCESS" will provide you with real-time access to collection dates and testing results. Please contact Customer Service for further information.
- The following personnel or their deputies have approved the results of the tests performed by QCL: Nicki Smith (Environmental Chemistry), Amanda Lukaszewski (Pharmaceutical), Ryan Baker (Dairy), Karen Battista (Food Micro), Jonathan Decenzi (Food Chemistry), Sue Abbott (QCL Delaware).

OCL Accreditations

Southampton Division EPA ID: PA00018

NELAP IDs: PA 09-00131; NJ PA166; NY 11223 State IDs: CT PH-0768; DE PA-018; MD 206

FDA Reg #: 2515238

Delaware Division State IDs: DE 00011; MD 138 Reading Division State ID: PA 06-03543 Wind Gap Division State IDs: PA 48-01334; NJ PA001 Vineland Division State ID: NJ 06005

East Rutherford Division State ID: NJ 02015

C00224

4. . . .

O QC Laborat	tories	1	CHAIN C	OF (CUSTO	ΟΥ	Lab LIMS No	L5257442	MATRIX CODES
1205 Industrial Blvd. Pi	hone: 215-355-39 ax: 215-355-72		Page _		_ of		LAB USE	ONLY: orbic/HCI Vials # HCI Vials	DW: DRINKING WATER GW: GROUND WATER
Client/Acct. No. Kleinfeld							# Na ₂ S		WW: WASTEWATER S0: S0IL
Address 3a1 Wo	all stree	Sample	ing Site Address: (if dif	ferent)			1	OH/Zn acetate pH	SL: SLUDGE
							# HNO	04 pH (1 0250 pl	OIL: OIL
City/State/Zip Princetor	NJO	8540					#		SOL: NON SOIL SOLIO
Phone/Fax 609	124 88	P.O. 1	NO. 6496	2			# Unpr		MI: MISCELLANEOUS
Client Contact Joseph	Schwar			,	Hulit		# Holp	OH 2.3 € TCED D control ID# 12430413	X: DTHER
PROJECT		, Co	ollection G C	Matrix	Number of C	ontainers	# temp	o control ID# 1675112	Fleid pH, Temp (C or F).
FIELD ID		Date	Military Time B P	Code	Total S C 3 N	# n n a n a n n a n n n a n n n n a n	A	NALYSIS REQUESTED	DO, Cl ₂ , S. Cond. etc.
IC-1U		9/24/14	0930 /	ww	اد		chi-a,	TP, Chl-a (volume)	area = 162.4 cm2
IC-25			1040 /	ww	a 1	1	cni-d,	TP, (hl-a (volume)	area = 182.7 cm2
IC-30			11301	ww	a I	1	Chla.	TP, (h)-a (volume)	area = 60.9cm²
PP-1U			1345:	ww	2 1	1	Chl-a		area = 60,9cm2
IC- 45			13001	ww	21	1	Chilta		ara= 182.7cm
IC-55		1	1415	ww	21	, 1	Chila		area = 182.7cm2
							, ,		
			-			-; :			
					,	1			
SAMPLED BY: (Name/Company) Vert	pal/fax data due:	/			mat: CStandard		<u> </u>	Field Parameters Anal	yzed By:
	dcopy due:	<u>//</u>			d+QC □NJR			Sig:	Date/Time:
			on rush (<14-21 day	-					1/24/14
			ED BIELOW, USE			ATURE, DA DAY€	T15.455	ARY TIME (24 HOUR CLOCK, I.E. 8AM IS	
AND AND LET	9/26/14	હૈં: 45	JAMES!			9/2/14	'/ PIAI/-	DELIVERY METHOD: ACC COURIER CLIEN	— Cosiody deal Notice
AELINOUSHER BY			RECEIVED BY	•		1/ 24/10		COMMENTS:	
RELINQUISHED BY		ME I	RECEIVED B			DATE	TIME /		!
RELINQUISHED BY	DATE TI		RECEIVED BY			DATE	TIME		
4 RELINQUISHED BY	DATE TI	ME I	4 RECEIVED BY			DATE	TIME		
5	L ``	I .	5					Hazardous: yes / no	

For example to aid completion, see reverse side.



APPENDIX C Periphyton Substrate Photo-Documentation









































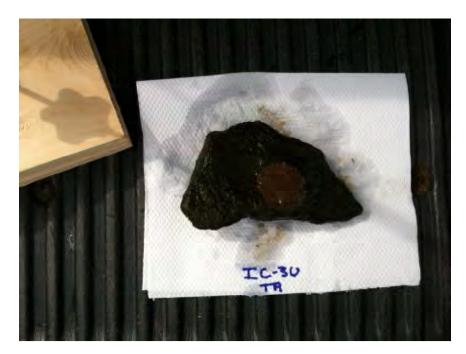




































































Exhibit 2

Nutrient Effect on Periphyton Growth in Streams

Citation	Parameter	Duration	Endpoint	Setting	Result
Bernhardt, E.S. & Likens, G.E. Controls on periphyton biomass in heterotrophic streams. Freshwater Biology. (2004). 49, 14-27.	N and P components, Light	21 days	Chl-a	10 streams in central New Hampshire	Nutrients only stimulated periphyton biomass when added in combination with high light treatments. Light and nutrient availability are both potentially important controls on periphyton growth. Experiment's nitrogen enrichment inhibited periphyton growth, reduced periphyton biomass on N diffusing substrates.
Bourassa, N., and A. Cattaneo. Control of Periphyton Biomass in Laurentian Streams (Quebec). Journal of the North American Benthological Society. Vol. 17(4) (Dec., 1998): 420 – 429	TP, TDP, Depth, Current, Light	2 months	Chl-a AFDM	12 streams	TP: 5 – 54 μg/L Chl-a: 5 – 55 mg/m ² None of the variables explained a significant fraction of the variability in Chl-a. Grazer biomass was significantly correlated with TP, suggesting nutrient effects on periphyton were obscured by grazing.
Bourassa, N., and A. Cattaneo. Response of a lake outlet community to light and nutrient manipulation: effects on periphyton and invertebrate biomass and composition. Freshwater Biology. (2002). 44, 629-639.	TP, Light	80 days	Chl-a	Lake outlet in Montreal, Quebec	Enriched TP: 17-88 µg/L Enriched chl-a: 130 mg/m² Unenriched TP: 7-21 µg/L Unenriched chl-a: 90 mg/m² Periphyton biomass was, on average, 3 times higher in open than in shaded channels. Periphyton AFDM and chl-a were significantly affected by light, whereas the effect of nutrient enrichment was not detectable.
Figueroa-Nives, D, T. Royer, and M. David. Controls on chlorophyll-a in nutrient-rich agricultural streams in Illinois, USA. Hydrobiologia (2006) 568: 287 – 298.	SRP, TP Light Turbidity Scour	6 months	Chl-a (mg/m²); AFDM	18 streams in watersheds dominated by row-crop ag.	SRP: 50 – 80 μg/L. Max Chl-a: 140 mg/m ² Study shows benthic algal growth significantly higher in non-shaded sites and a significant relationship between chl-a and turbidity .
Greenwood, J. and A. Rosemond. Periphyton response to long-term nutrient enrichment in a shaded headwater stream.	SRP Light	2 years	Chl-a (mg/m²); AFDM;	Headwater Stream	Max Growth – 25 mg/m ² during Spring <10 mg/m ² during July-Sept. SRP – 45 – 51 μg/L (See, Fig 2 at 2037)

Can. J. Fish. Aquat. Sci. 62: 2033 – 2045 (2005)			Bio-vol.		Illustrates effect of shading on growth.
Hill, W., S. Fanta, and B. Roberts. Quantifying phosphorus and light effects in stream algae. Limnol. Oceanogr. 54(1), 2009, 368 - 380	SRP Light	13 days	Chl-a (mg/m²); Bio-vol.	Artificial Stream	Max Growth – 150 mg/m ² SRP – 12 μg/L (See, Fig 1 at 372) SRP – 25 μg/L (saturation conc.) Algal growth strongly limited by inadequate light (<2 mol photons/m ² /d) characteristic of moderately developed tree canopy
Hill, W. & S. Fanta. Phosphorus and light colimit periphyton growth at subsaturating irradiances. Freshwater Biology. (2008). 53, 215-225.	SRP, Light	1 day	Chl-a	Large flow- through lab streams	Growth rate plateaued at $\mu \approx 0.25$ above 22 $\mu g/L$ SRP. The relationship between periphyton growth and SRP conc. suggests nutrient SRP criteria $\geq 25~\mu g/L$ will do little to preclude stream eutrophication. *Study concludes with "We suggest that nutrient standards be applied to streams regardless of their light regimes."
Kiffney, P., and J. Bull. Factors controlling periphyton accrual during summer in headwater streams of Southwestern British Columbia, Canada. Journal of Freshwater Ecology, Vol. 15(3) – Sept, 2000	Phosphorus, Light, Grazers	6 weeks	Chl-a AFDM Accrual Rate	Natural streams; test stream has forested and clear sections	Natural levels of Phosphorus were low in all streams (1.4 – 1.8 μg/L). Study evaluated effect of shade and grazers on periphyton. Light was clearly a limiting factor (Chl-a 190 mg/m² in open stream; < 50 mg/m² in canopied streams) (See, Fig 3 at 345)
Mallory, M.A. & Richardson, J.S. Complex interactions of light, nutrients and consumer density in a stream periphyton-grazer (tailed frog tadpoles) system. Journal of Animal Ecology. (2005). 74, 1020-1028.	N and P components, light	42 days	Chl-a, AFDM	Small, steep streams in coastal BC, Canada	$SRP = 3 \ \mu g/L \\ TN < 1 \ \mu g/L \\ Shade chl-a: 0.5-1.0 \ mg/cm^2 \\ Light chl-a: 1.2-2.4 \ mg/cm^2 \\ Chl-a abundance was 23-66% higher under light conditions than shade.$



water environment and technology

Lab practices

Activated sludge

Asset management
Decentralized systems

August 2014

Changing perspectives

Energy recovery and production

իրաներիկինիր վիայինակների անձան

LLIAM 1 HALL LL ASSOCIATES SO I ST WW STE 701 SO IST WW STE 701

T MUENT UNEIT 0035 HS HST8LT



Mercury falling

How a facility upgrade intended to reduce algae growth resulted in unintended (yet favorable) consequences

Robert Brent, Ross Morland, David Berberich, Spencer Davis, Brandon Foltz, and Kurt Drummond



hile most residents generally are concerned about the health of local rivers, lakes, and estuaries, often it is difficult for them to see the immediate benefits of costly facility upgrades, especially for a waterbody more than 480 km (300 mi) downstream. The City of Waynesboro, Va., faced this challenge when it upgraded the Waynesboro Wastewater Treatment Plant in 2010 to meet newly promulgated Virginia nutrient regulations for dischargers within the Chesapeake Bay watershed.

Waynesboro, a small city of about 20,000 nestled in the foothills of Virginia's Blue Ridge Mountains, is located on the

South River, which forms the headwaters of the Shenandoah-Potomac River system, a major tributary to the Chesapeake Ba

To demonstrate that nutrient reductions aimed at reducing eutrophication in the bay also could improve local water quality the city partnered with researchers from James Madison University (JMU; Harrisonburg, Va.) to study water quality improvements to the South River throughout the upgrades. While the main objective – to reduce algal growth – was not necessarily achieved, a surprising side benefit was the possibl reduction in methylmercury accumulation within this mercury-impaired stream.

■ Five monitoring stations were set up on the South River upstream
and downstream of the Waynesboro Wastewater Treatment Plant
discharge point. Dissolved oxygen, pH, conductivity, temperature,
chloride, nitrate, sulfate, total phosphorus, filtered and unfiltered total
mercury, and filtered and unfiltered methylmercury were measured.
Robert Brent

The need to reduce nutrients dramatically

Virginia nutrient regulations required that the water resource recovery facility (WRRF) reduce annual nitrogen loads to 22,103 kg (48,729 lb) and annual phosphorus loads to 1658 kg (3655 lb) by January 2011. This meant that the facility would need to reduce loads by 65% and 88%, respectively. To meet the new regulations, the city replaced trickling filters and rotating biological contactors with a five-stage Bardenpho biological nutrient removal (BNR) process and denitrification filters. In addition, the facility was expanded from 15,000 m³/d (4 mgd) to accommodate a 23,000-m³/d (6-mgd) design flow, new secondary clarifiers were constructed, disinfection was upgraded, and a solids dewatering facility was added.

The upgrades and BNR installation at the WRRF were effective, at least from a treatment perspective. Prior to the upgrades, total nitrogen levels in effluent averaged 17 mg/L, while total phosphorus levels averaged 4 mg/L. Within 1 year of the upgrades, nutrient levels dropped dramatically (see Figure 1, below). By 2011, average total nitrogen levels dropped to 1.17 mg/L, and phosphorus levels dropped to 0.12 mg/L – reductions of 93% and 97%, respectively. Annual loads similarly were reduced, and the city met Chesapeake Bay nutrient regulations with nitrogen and phosphorus loads of 4879 kg (10,756 lb) and 350 kg (771 lb), respectively, in 2011.

Upgrade effects on algal growth and mercury uptake

While the upgrades at the WRRF primarily were intended to meet Chesapeake Bay watershed goals, the upgrades likely also would improve local water quality in the South River. To quantify those improvements, JMU researchers began a water quality study in 2010 that intensively monitored the river prior to, during, and after the upgrades.

The researchers established five monitoring stations on the South River: 0.40 km (0.25 mi) upstream from the WRRF discharge and 0.2, 0.8, 2, and 16 km (0.1, 0.5, 1.2, and 10 mi) downstream

from the discharge point (see Figure 2, p. 64). At each station, the following water quality parameters were measured: dissolved oxygen, pH, conductivity, temperature, chloride, nitrate, sulfate, total phosphorus, filtered and unfiltered total mercury, and filtered and unfiltered methylmercury.

In addition, the JMU team measured the growth of algae in the river and the uptake of mercury by the algae. Algal growth is a direct measure of nutrient enrichment, so algal growth rates would presumably decrease with reduced nutrient loads. There also was a possibility that nutrient reductions could affect the cycling of mercury, a long-term contaminant in the river. Legacy industrial sources had polluted the river with mercury decades ago, and sport fish, like smallmouth bass, continue to exceed safe mercury levels for human consumption.

The cycle of mercury accumulation in the river begins with inorganic mercury being transformed to the more bioavailable methylmercury form under low oxygen conditions. Methylmercury is then taken up by algae and transferred up the food chain to invertebrates, to small forage fish, and then to top predators such as smallmouth bass. Nutrient reductions in the river could raise dissolved oxygen levels and lower mercury methylation rates, resulting in lower mercury levels at each link in the South River food chain.

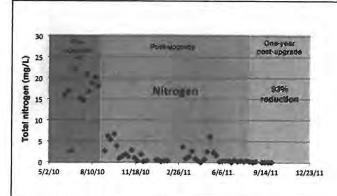
To measure algae growth and mercury uptake, the JMU team placed eight baskets of clean rocks at each monitoring location. Algae were allowed to colonize the rocks and grow for 6 weeks. At 2, 4, and 6 weeks of colonization, the rocks were removed and a defined area was scraped to remove the colonized algae. Algae samples were dried, weighed, and ashed at 500°C to determine biomass. A second batch of 6-week samples were scraped from the rocks and analyzed for mercury and methylmercury content.

Nutrient results

As stated earlier, the BNR upgrades were highly successful in reducing nutrients in the discharge. These reductions also affected nutrient levels in the South River (see Figure 3, p. 65). South River phosphorus levels decreased within a range of 85% to 94% downstream of the outfall. Reductions in nitrogen concentrations, however, were not as dramatic. Nitrate levels downstream of the outfall dropped in a range of 39% to 59%.

Nonpoint sources of nitrogen in the watershed explained the smaller reductions observed for instream nitrate levels. Prior to upgrades, the Waynesboro facility outfall contributed approximately

Figure 1. Nutrient reductions in Waynesboro facility discharge



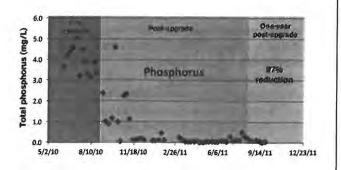
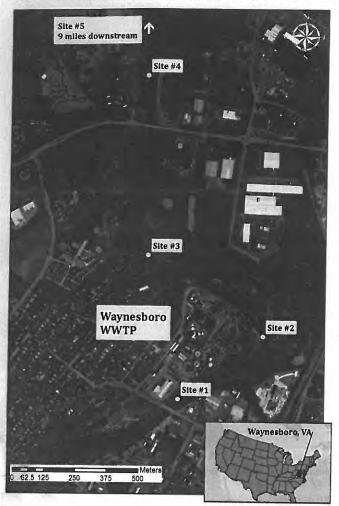


Figure 2. Location of Waynesboro monitoring sites



93% of the instream phosphorus load at that point in the South River. However, for nitrogen, the facility discharge accounted for a smaller fraction of instream loads (63%).

Other instream water quality indicators showed no consistent or significant trends resulting from the upgrades. Conductivity and temperature varied by season but were relatively unaffected by the upgrades. Chloride, sulfate, and pH were unchanged. Dissolved oxygen conditions within the river improved somewhat, but diurnal variations made it difficult to determine whether these improvements were significant and resulted from the upgrades.

Algae growth increases despite nutrient reductions

Algal growth did not decrease significantly after the upgrades at any of the locations (see Figure 4, p. 65). In fact, at one site located 0.8 km (0.5 mi) from the outfall, algal growth increased significantly, nearly doubling from 1.2 to 2.1 mg/cm².

The reason was not definitively identified. It is possible that while overall nitrogen levels decreased in effluent, more reduced nitrogen in the form of nitrite or ammonia was available directly downstream. Since ammonia is a more readily available nitrogen source for algae growth than nitrate, this could have spurred algal growth for a short distance downstream until reduced forms were oxidized to nitrate.



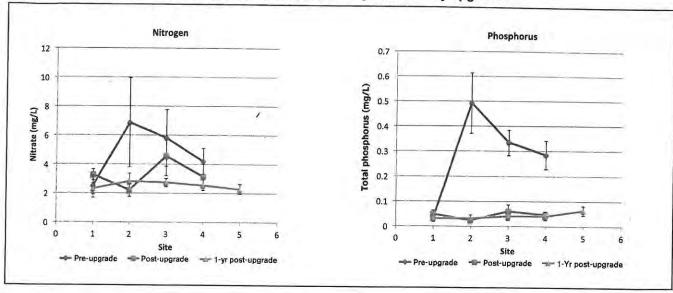
Research assistants Brandon Foltz and Kurt Drummond sample algae on rocks from the South River. Robert Brent

The finding that algal growth had not decreased after the upgrades is interesting. The purpose of nutrient regulations in the Chesapeake Bay watershed is to reduce algae growth and improve water quality in the bay. However, even at a local scale, large nutrient reductions (greater than 90%) were not effective in limiting algae growth. Certainly, Waynesboro's lower nutrient loads will be multiplied by reductions from other point sources throughout the watershed, but the ultimate fate of the bay may rest in the hands of nonpoint nutrient sources. In the South River, even when the primary phosphorus source (Waynesboro facility) was reduced by 97% and instream levels were reduced 94%, algae growth was not reduced. This is because remaining nutrient levels in the river from point source residuals and nonpoint sources have yet to reach critical thresholds. The U.S. Environmental Protection Agency's recommended nutrient criteria for this ecoregion are 0.01 mg/L phosphorus and 0.31 mg/L nitrogen. Even after upgrades, average nitrogen levels in the South River were twice this recommendation,



Baskets of clean rocks were used to colonize algae in the South River for biomass and mercury analysis. Robert Brent

Figure 3. Nutrient reductions in the South River resulting from facility upgrades



and phosphorus levels were 3 to 4 times higher than the recommended level. To meet both local water quality goals and Chesapeake Bay watershed goals, significant help is needed from the nonpoint source community.

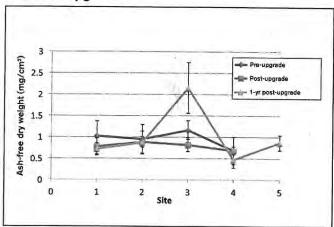
Mercury uptake results promising

To evaluate the effects of nutrient upgrades on mercury cycling, methylmercury concentrations in algae at each time period and location were normalized against the upstream control site (Site 1).

Normalized methylmercury concentrations in algae downstream of the Waynesboro outfall decreased significantly after the upgrades (see Figure 5, below), ranging from 44% to 81% in downstream stations. This indicates that as nutrient loads decrease, the rate of mercury methylation slows down, reducing the amount of bioavailable mercury. This added benefit, which was not intended as a part of the Waynesboro facility upgrades, may be one of the most beneficial outcomes of the upgrades.

The City of Waynesboro spent \$32 million on upgrades aimed at reducing nutrients in the Chesapeake Bay. The

Figure 4. Algae growth downstream of the Waynesboro Wastewater Treatment Plant before and after upgrades



upgrades were extremely successful in reducing nitrogen and phosphorus in the discharge and in the receiving stream, the South River. But these large nutrient reductions did not translate into reduced algal growth in the river.

Still, perhaps the most surprising finding from the study was that the nutrient reductions might help to improve mercury contamination issues in the river. Large reductions in mercury loadings from the former industrial site and the watershed will still be needed to reach safe fish consumption goals, but the effect of nutrient reductions on mercury dynamics may help to reach this goal sooner.

Robert Brent is an associate professor at James Madison University (Harrisonburg, Va.). At the time this project was conducted, David Berberich, Spencer Davis, Brandon Foltz, and Kurt Drummond were undergraduate research assistants at James Madison University. Ross Morland is the coordinator at the Waynesboro Wastewater Treatment Plant for the City of Waynesboro, Va.

Figure 5. Mercury uptake in algae before and after upgrades

